



Balsam Law Firm, PLLC
315 Madison Avenue, Ste. 1306
New York, NY 10017

P: +1.212.286.8899
F: +1.888.227.0711
E: howie@balsamlawfirm.com

April 21, 2020

Via ECF

Magistrate Judge Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Roberta Ludwig v. Marianne Tasker
Docket No.: 2:19-CV-03870 (RRM) (RLM)

Dear Judge Mann:

Please allow this to serve as the party's joint request for a further eight (8) week extension of for each of the already modified discovery deadlines, with fact discovery ending on July 21, 2020. The parties have been unable to conduct depositions and expert reports due to the Covid-19 pandemic, but are interested in mediation once they are held. The plaintiff is in her mid 60's, resides in Florida, and is currently unable to safely travel to New York. The defendants reside in Canada and are also precluded from traveling. This is the party's second joint request for an extension on this matter.

Thank you in advance for your consideration.

Very truly yours,

Balsam Law Firm, PLLC,

Howard A. Balsam, Esq.

HAB/nm

Cc: Shaun Malone, Esq. via ECF